

SCANNED

DATE: 2-10-04

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CMC

2004-02-10 P 10:56

UNITED STATES OF AMERICA

V.

JOSEPH DIFLUMERA
Defendant

) Criminal Number: 4:04CR40002-NMG
)
) Violations:
)
) 18 U.S.C. §§ 1951 and 2 -
) Interference with Commerce
) By Extortion (Hobbs Act)

INFORMATION

The United States Attorney charges that:

COUNT ONE

[18 U.S.C. § 1951]

Between January 1989 and September 8, 2003, in Worcester County and elsewhere in the District of Massachusetts, the defendant,

JOSEPH DIFLUMERA,

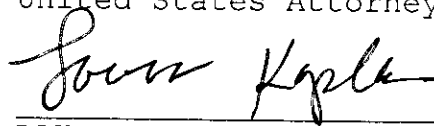
and others did knowingly and unlawfully, obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in commerce, by extortion, as that term is defined in Title 18, United States Code, Section 1951(b)(2), in that he did attempt to and did obtain property, to wit, in excess of \$1,000,000 from Company ABC, with its consent, which consent had been induced through the wrongful use of actual and threatened force, violence and fear.

In violation of Title 18, United States Code, Sections
1951 and 2.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:

A handwritten signature in cursive script, appearing to read "Laura Kaplan", written over a horizontal line.

LAURA J. KAPLAN
Assistant U.S. Attorney

Date: February 9, 2004